

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ROBERT STROUGO, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

LANNETT COMPANY, INC., TIMOTHY C.
CREW, and MARTIN P. GALVAN,

Defendants.

Case No. 2:18-cv-03635-MAK

Judge Mark A. Kearney

**TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR COUNSEL OF
RECORD:**

PLEASE TAKE NOTICE that Michael Hoeltzel and Soe Wong (“Plaintiffs”), by and through their counsel, Levi & Korsinsky, LLP, will and hereby do move this Court, under Rule 23 of the Federal Rules of Civil Procedure, for entry of an order: (i) preliminarily approving the proposed Settlement; (ii) certifying the proposed Class, certifying Plaintiffs as class representatives, and appointing Levi & Korsinsky, LLP as class counsel for purposes of the Settlement; (iii) approving the form and manner of giving notice of the proposed Settlement to the Settlement Class Members; and (iv) scheduling a hearing to consider final approval of the Settlement, approval of the Plan of Allocation, Plaintiffs’ Counsel’s motion for an award of attorneys’ fees and reimbursement of litigation expenses,.

Plaintiffs’ motion is supported by the Stipulation of Settlement dated July 12, 2019 (filed herewith as Docket No. 68), including the exhibits attached thereto, the accompanying brief in support, and the Declarations of Adam M. Apton and Luiggy Segura on behalf of JND Legal

Administration. Also attached hereto is the parties' agreed-upon Proposed Approval Order granting Plaintiffs' motion.

Dated July 12, 2019

Respectfully submitted,

O'KELLY ERNST & JOYCE, LLC

/s/ Ryan M. Ernst

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*Attorneys for Lead Plaintiffs Soe Wong
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the Class*